UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 21, 2011

Glenn Stark, Water Quality Manager
Department of Environmental Quality
Gila River Indian Community
35 Pima St. (PO Box 97)
Sacaton, AZ 85247

Re: Status of Former Romic Facility
6760 West Allison Rd.
Chandler, AZ 85226
EPA # AZD 009 015 389

Dear Mr. Stark:

In response to a query from Ms. Esther Manuel (General Manager) of the Lone Butte Industrial Development Corporation (LBIDC) concerning reuse of the former Romic Facility during the current and anticipated Corrective Action project I have reviewed the reports and data available and make these observations. Your thoughts and comments may also be helpful to Ms Manuel.

The former Resource Conservation and Recovery Act (RCRA) regulated facility was clean closed in 2010. All of the permitted units were determined to be clean and no longer regulated under RCRA. However, previous investigations had revealed contamination of the groundwater (GW) and the vadose zone with the volatile organic compounds (VOCs) trichloroethene (TCE), tetrachloroethene (PCE), and acetone. The TCE and PCE appear associated with operations at the former facility. Romic has also entered into an Administrative Order on Consent with the U.S. Environmental Protection Agency (US EPA) in 2007 (amended 2008) to investigate and address the contamination.

Subsequent investigation and interim corrective measures has revealed VOC contamination of the GW of the regional aquifer (below 70 feet bgs) and a perched zone (between 40 and 60 feet bgs) with associated soil vapor contamination. Soil Vapor Extraction (SVE) under the former facility has significantly reduced the VOC levels found in the vadose zone associated with the perched zone. Some rebound has occurred and may indicate migration from beyond the extraction wells' sweep radius.

The RCRA Investigation workplan submitted by Romic in December, 2011 indicated that Romic will need to drill at least one additional shallow soil boring at the site as part of the proposed Soil Vapor Risk Analysis it will conduct, and access to some of the existing SVE wells may also be necessary to collect additional data or conduct corrective action measures that may be indicated by the investigation. Additionally, access to the existing GW wells may be required for chemical oxidation of the GW contamination.

As long as access to existing wells and any future wells deemed necessary is maintained we feel that it is appropriate and desirable that the property be returned to productive industrial use. The fact that the majority of the operational area at the site is covered by a concrete cap reduces our concerns of an acute or short term vapor intrusion issue. That said, we feel that any such interim redevelopment of the site should maintain the integrity of the existing cap until such time as the additional investigation and vapor intrusion analysis allows us to make a formal long-term determination of potential health impacts. Until such a formal determination is made we would like to be kept informed of, and consulted with on any specific construction or de-construction on the site involving the integrity of the cap.

If you have any thoughts or comments regarding the issues please contact me at (415) 972-3346.

Sincerely,

John R Moody

John R. Moody
Project Manager

cc: R. Sugerman (EPA, ORC)
E. Manuel (LBIDC)